January 23, 2023

Dear Chairman Majumdar and Members of SEAB,

As FERC Chairman Willie Phillips wisely observed a few days ago, we should "continue to focus our efforts on reliability and resilience" while we advance other goals. It is not a question of either / or. [See his Keynote address to District of Columbia 2023 Clean Energy Summit - a Summit entitled "Path to Decarbonization" - January 18, 2023.]

So, too, should SEAB advise our Secretary of Energy. She and her team must not lose sight of threats to reliability and resilience — including threats to existing fleets of nuclear power plants of ourselves and our allies and inadequate understanding and protection of sensors whose functioning is essential to the electric power grid, on which so much else depends.

Secretary Granholm and her team should open-mindedly absorb insights of experts with hands-on experience, including M. Gene Lim and Joseph Weiss.

They should also consider remarkable insights accumulated by some researcher / activists who lack hands-on experience but somehow gained access to closely held information.

- See VT Padmanabhan et al. Space Weather Anomalies, Power Grid Collapse and Nuclear Safety

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A5VZ6/resource/work/6985297/Space_Weather_Anomalies_Power_Grid_Collapse_And_Nuclear_Safet y?email_work_card=title

They should convince the NRC to pay heed to U.S. Air Force criticism of NRC reliance on simulations alone to "test" standby emergency diesel generators at nuclear power plants.

They should find ways to assure urgent seizure by good guys of hostile drones shot done over or near critical energy infrastructure - not risking "disappearance" of downed drones while good guys delay.

Last Wednesday it was publicly disclosed that the area radiation monitors at the Waterford 3 nuclear power plant in Louisiana had been miscalibrated for 2 or more months.

As FERC Chairman Willie Phillips also said (quoting Rev. Dr. Martin Luther King, Jr.): What affects one of us indirectly, affects all of us directly.

Faithfully, David Jonas Bardin

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Addendum

January 24, 2023

My comments about emergency diesel generators (EDGs) rely on a 2019 report, "ELECTROMAGNETIC DEFENSE TASK FORCE 2.0" by Major Stuckenberg, Ambassador Woolsey, and Colonel DeMaio (edited by Donna Budjenska) which was published by U.S. Air Force's LeMay Institute.

That report grew out of a conference which included Staff of the Nuclear Regulatory Commission (NRC).

In addition to EDGs, that report discusses two categories of planning events which NRC considers outside scope of its licensing responsibility. These are beyond-planning-event (BPE) and beyond-planning-external-event (BPEE).

That report details agreements and disagreements between its authors and NRC staff as to several issues. It devotes scores of pages - chapters and appendices - to both side's conclusions and views.

In one instance (spent fuel cooling ponds), NRC staff's point seems sensible. In other respects, less so. For example, NRC and NRC Staff's reliance on simulations instead of actual testing of EDGs.

What seems to be lacking is hands-on experience in nuclear power plant planning, design, construction, and operation to guide discussion and debate. Making do, instead, with abstract, academic assumptions.

I stand by my public comment that Secretary Granholm and her Team have a role to play. Before I further supplement my public comment, however, I would welcome a chance to talk with Dr. Shirley Ann Jackson if she would indulge me.

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